

Hearing Date: September 27, 2023, at 9:00 a.m. (prevailing Eastern Time)
Objection Deadline: September 8, 2023, at 5:00 p.m. (prevailing Eastern Time)

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*Special Litigation Counsel for Debtors and
Plaintiff Celsius Network Limited*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹
Debtors.

CELSIUS NETWORK LIMITED,
Plaintiff,
v.

STAKEHOUND SA,
Defendant.

Chapter 11
Case No. 22-10964 (MG)
Jointly Administered

Adversary Proceeding
No. 23-01138 (MG)

NOTICE OF MOTION FOR PRELIMINARY INJUNCTION

¹ The Debtors in these chapter 11 cases (the “Chapter 11 Cases”), along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network, Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The Debtors’ service address in these Chapter 11 Cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure (“FRBP”) 7065 and Federal Rule of Civil Procedure (“FRCP”) 65, Plaintiff Celsius Network Limited (together, “Celsius”) respectfully submit this Notice of Motion for a Preliminary Injunction (the “Notice” of the “Motion”) against Defendant StakeHound S.A. (“StakeHound,” together with Celsius, the “Parties”). In support of the Motion, Celsius submits the filed (i) Memorandum in Support of the Motion dated August 23, 2023 [ECF No. 39] (the “Memorandum”); (ii) Declaration of Richard Man in support of the Motion dated August 23, 2023 [ECF No. 40], including all exhibits annexed thereto; (iii) Declaration of Felix Dasser, Esq. dated August 23, 2023, in support of the Motion [ECF No. 37], including all exhibits annexed thereto; (iv) Declaration of Mitchell Hurley, Esq. dated August 23, 2023, in support of the Motion [ECF No. 35], including all exhibits annexed thereto; (v) Transfer Declaration of Richard Man in support of the Motion dated August 25, 2023, including all exhibits annexed thereto, filed contemporaneously herewith; and (vi) the Proposed Order attached hereto as Exhibit A, granting the Motion.

PLEASE TAKE FURTHER NOTICE that a hearing on the relief requested in the Motion will be held before the Honorable Martin Glenn on **September 27, 2023, at 9:00 a.m., prevailing Eastern time.** The hearing will be held in person before the Honorable Martin Glenn, Chief United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, in Courtroom No. 523, located at One Bowling Green, New York, New York 10004-1408. The public, including members of the media, may only attend the hearing in the courthouse, not remotely. This change in practice regarding evidentiary hearings reflects the policies of the Judicial Conference of the United States that are anticipated to be in effect on the date of the hearing. Any person or entity that is permitted to attend the hearing by Zoom must

register in advance and will be required to certify under oath that they are appearing in a permitted capacity. Those Parties who qualify and wish to participate in the hearing via Zoom must register their appearance utilizing the Electronic Appearance portal located on the Court's website at: <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Appearances must be entered no later than **September 26, 2023, at 4:00 p.m., prevailing Eastern time.**

PLEASE TAKE FURTHER NOTICE that copies of the Motion and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/celsius>. You may also obtain copies of the Motion filed in these chapter 11 cases by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the preliminary injunctive relief sought in the Motion (the "Objections") shall (i) be in writing (with the brief not to exceed 25 pages; page limit does not apply to supporting evidence); and (ii) be served in accordance with the August 22, 2023 *Order Regarding Case Management and Initial Briefing Schedule* [ECF No. 30] (the "Scheduling Order"), so as to be filed and received no later than **September 8, 2023, at 5:00 p.m., prevailing Eastern time.**

PLEASE TAKE FURTHER NOTICE that any replies to the Objections shall (i) be in writing (with the brief not to exceed 10 pages; page limit does not apply to supporting evidence); and (ii) be served in accordance with the Scheduling Order, so as to be filed and received no later than **September 15, 2023, at 5:00 p.m., prevailing Eastern time.**

PLEASE TAKE FURTHER NOTICE that counsel for the Parties can agree to modify the briefing schedule provided in the Scheduling Order without further order of the Court provided

that all briefing must be completed on or before **September 15, 2023, at 5:00 p.m., prevailing Eastern time.**

Dated: August 25, 2023
New York, New York

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